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April 24, 2019

VIA ECF and email

Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Raniere, et al.*, 18-cr-204 (NGG) (VMS)

Dear Judge Scanlon:

We write jointly on behalf of defendant Clare Bronfman and the Privilege Review Team ("PRT"). Both parties respectfully request to provide the Court with the requested status update on any outstanding privilege issues in need of resolution, currently due today at noon, at the scheduled conference for NXIVM and the PRT on Monday, April 29, 2019, or afterwards in writing, if so requested by Your Honor. Counsel for Clare Bronfman is available to attend the Monday conference if requested.

First, both the PRT and Bronfman need additional time to consult with Mr. Sullivan, counsel for NXIVM, who is returning from a trip abroad later today. NXIVM counsel is in the process of preparing materials for Judge Garaufis regarding the viability of NXIVM's privilege assertions. This issue necessarily impacts many of the documents Ms. Bronfman has previously asserted privilege over and a brief extension will allow Defendant and the PRT time to confer with Mr. Sullivan prior to updating the Court. Further, the PRT has informed us that at this time, they do not anticipate seeking the Court's intervention as to the most recent set of 236 documents in question between the PRT and Bronfman's counsel. If there are any disputes as to this set of documents, the parties anticipate being able to resolve those without Court intervention or will seek the Court's intervention at a later date.

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All counsel will be better positioned to update the Court on any remaining privilege issues at or after the conference on Monday. Thank you in advance for your consideration.

Respectfully submitted,

/s/

Kathleen E. Cassidy
Caroline M. Grosshans

cc: AUSA Shannon Jones, Privilege Review Attorney (by email)
AUSA Philip Pilmar, Privilege Review Attorney (by email)
AUSA Alicia Washington, Privilege Review Attorney (by email)
Mike Sullivan, Counsel for NXIVM (by email)